

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | CC Docket No. 99-200 |
| Number Resource Optimization |) | |
| |) | |

COMMENTS OF VERIZON WIRELESS

Verizon Wireless hereby responds to the Common Carrier Bureau's *Public Notice* requesting comment on the national thousands-block number pooling ("TBNP") roll-out schedule.¹ Verizon Wireless has a vested interest in this proceeding commensurate with that of wireline carriers and the state commissions given its commitment to begin participation in TBNP on November 24, 2002.

The FCC can assist carriers' efforts to implement TBNP nationwide by establishing a clear schedule. The schedule should reflect the comments submitted in this proceeding, including requests by states to modify the proposed list of pooling NPAs by opting in or out, substituting alternative NPAs, or otherwise requesting schedule changes. At the conclusion of this proceeding, the FCC should publish a final list of pooling NPAs that allows carriers charged with implementing TBNP in their networks sufficient time to implement the schedule.

¹ The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule, *Public Notice*, DA 01-2419, CC Docket No. 99-200, released October 17, 2001.

The FCC should establish a moratorium on additional state trials beyond those already authorized.² The only possible exception to this policy should be for NPAs that have been targeted by the FCC for pooling implementation in the first quarter on the national pooling roll-out schedule. The national schedule prioritizes NPAs based on the top 100 MSAs, especially those NPAs in jeopardy status that are also within the top 100 MSAs.³ The FCC should not divert resources away from meeting the national pooling roll-out schedule with additional state trials that may not meet the criteria established for the national schedule.

The schedule that is adopted should be based on real world experiences in the state trials. The TBNP administration guidelines issued by the Industry Numbering Committee (“INC”) establish eight pre-pooling milestones for pooling establishment.⁴ Specifically, those milestones begin with an implementation meeting and conclude with the mandated implementation date. Given the amount of work the industry has identified for pooling establishment and experience gained in the state trials, the Commission should reaffirm the uniform INC guidelines and allow realistic timeframes for establishing a pool.⁵

² The FCC recently authorized two new state pooling trials in South Carolina and Florida despite the fact that the subject NPAs were not in jeopardy, which is one of the criteria for granting authority to states to implement TBNP ahead of the national rollout schedule. *See Number Resource Optimization First Report and Order*, 15 FCC Rcd. at 7665; *See Number Resource Optimization Order*, CC Docket No. 99-200, at ¶¶ 16&19, released October 24, 2001.

³ The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout schedule, *Public Notice*, DA 01-2419, CC Docket No. 99-200, released October 17, 2001.

⁴ Industry Numbering Committee, Thousands-Block Number (NXX-X) Pooling Administration Guidelines at 23, table 1, dated September 24, 2001.

⁵ The national pooling schedule should take into account the Numbering Resource Utilization and Forecast (“NRUF”) reporting cycles and the substantial amount of work required for multiple obligations imposed by the Numbering Resource Optimization Orders. Further, the FCC should clarify that the industry is required to provide forecast, block level contamination reports, inventory and donation reports only to the Pooling Administrator. Multiple reporting obligations will unduly burden carriers and are not needed to establish the pools.

Verizon Wireless requests that the Commission standardize and finalize its national pooling procedures and the roll-out schedule in an order soon. Certainty about the process and the schedule will provide carriers with desired lead-time that will potentially help resolve workload issues given resource constraints.

Respectfully submitted,

VERIZON WIRELESS

By:

John T. Scott, III

John T. Scott, III
Vice President and Deputy General
Counsel – Regulatory Law

Anne E. Hoskins
Regulatory Counsel

Lolita D. Smith
Associate Director Regulatory Matters

Verizon Wireless
1300 I Street, N.W., Suite 400-West
Washington, D.C. 20005
(202) 589-3760

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